

From: comment, reg
Sent: Monday, July 01, 2002 5:36 PM
To: Evans, Merete
Subject: FW: Text Format Comment on 31 CFR Part 501

-----Original Message-----

From: djohnson@maximbanks.com [mailto:djohnson@max~mbanks.com]
Sent: Thursday, June 20, 2002 12:22 PM
To: reg.comment@do.treas.gov
Subject: Text Format Comment on 31 CFR Part 501

Name: David Johnson
Address: 307 Tree Bark LN
League City, TX 77573
Work Phone: 281-337-8426
Email: djohnson@maximbanks.com
Regulation: 31 CFR Part 501

Comments: I provide a service (Update Software Services) to financial institutions using the downloaded OFAC delimited files converted into database form. Soliciting **an** 'unaware' business **is** difficult as there is little information to present that "here is what can happen" if you violate **a** sanction law. Yes there are still folks out here (even after 9/11) who will not verify who they are doing business with.

Basically, if we have public records of those who were caught doing business with our enemies, it will help convince those without a procedure to implement one with due haste. I would like to see the public record expanded to include criminal and corporate decisions in addition **to** only civil penalties. In fact, I would prefer to see criminal and corporate rather than civil information if given only one or the other.

I am also Information Systems Manager for MaximBank in Dickinson, Texas where we do have *a* three way approach to preventing sanction violations. We check each transaction at that moment using the SDN database software. **We** send our customer file to **a** third party for OFAC scanning on a quarterly basis. Thirdly, we check our customer file with the OFAC change information after an OFAC update.

We need **to** have **examples** (public disclosure **of** all sanction violations) to 'convince' those who are not otherwise convincible.

Please,
David Johnson